

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:

Petition for Rulemaking of Geo)	
Broadcast Solutions, LLC to Permit)	
Origination of Programming on FM)	RM No. 11659
Booster Stations)	
)	

To: The Commission

**COMMENTS OF HARRIS CORPORATION,
BROADCAST COMMUNICATIONS DIVISION**

Harris Corporation's Broadcast Communications Division ("Harris Broadcast") respectfully submits these comments in support of Geo Broadcast Solutions, LLC's ("GBS") *Petition for Rulemaking* ("Petition").¹ The Federal Communications Commission ("Commission") has issued a *Public Notice*² requesting comment on GBS' Petition to modify 47 C.F.R. § 74.1231(i), to permit FM booster stations to originate programming. Harris Broadcast has been working with GBS to study and implement a system that would use FM boosters to allow a FM radio station to broadcast simultaneous, but discrete, announcements to different parts the station's Designated Market Area ("DMA"). Harris believes that GBS' proposed system would advance the public interest and can be implemented in a manner that does not cause harmful interference with other stations. Harris supports GBS' *Petition* and encourages the Commission to adopt a Notice of Proposed Rulemaking to fully evaluate GBS' proposal.

¹ See Petition for Rulemaking of Geo Broadcast Solutions, LLC, Rulemaking No. 11659 (filed Apr. 4, 2012) ("GBS Petition for Rulemaking").

² See In the Matter of Petition for Rulemaking of Geo Broadcast Solutions, LLC To Permit Origination of Programming on FM Booster Stations, *Public Notice*, Report No. 2949, Rulemaking No. 11659 (rel. Apr. 23, 2012).

Harris Broadcast, a division of Harris Corporation,³ is a leading developer and manufacturer of analog and digital television and radio transmission systems and end-to-end broadcast system solutions. Headquartered in Denver, Colorado, Harris Broadcast operates the world's largest transmission manufacturing facility in Quincy, Illinois and also maintains broadcast research centers in across the United States and Canada. Harris Broadcast is an active member of radio industry and standard setting organizations including the National Association of Broadcasters, World DAB Forum, National Radio Systems Committee, and the North American Broadcast Association. Harris Broadcast is committed to facilitating technological advancement within the broadcast industry and focused on helping its radio and television customers succeed in the digital age.

Harris believes that GBS' proposed system would advance the public interest by utilizing FM boosters to promote Commission values of localism,⁴ provide economic benefits to both stations and small businesses,⁵ and enable more targeted political speech.⁶ Harris Broadcast also supports GBS' conclusion that the experimental authorizations demonstrated the "viability of [GBS'] engineering approach...the tests evidenced minimal interference between the FM boosters themselves, or either the primary stations signal or booster associated with other stations."⁷ Through a unique system design and modern RF techniques GBS has developed a way for FM stations to provide an ultra-hyper local radio service to the public within a station's

³ Harris Corporation is an international communications and information technology company serving government and commercial markets in more than 150 countries. Headquartered in Melbourne, Florida, the company has approximately \$6 billion of annual revenue and about 17,000 employees - including nearly 7,000 engineers and scientists.

⁴ See GBS Petition for Rulemaking, *supra* note 1, at pgs. 7-11.

⁵ See *Id.* at pgs. 12-13.

⁶ See *Id.* at pg. 14

⁷ *Id.* at pg. 6.

existing DMA and without causing harmful interference. GBS' proposal is a novel use of FM boosters, likely unforeseen when the service was established in 1970, and has the potential to provide new and significant public interest benefits. The benefits of the GBS system stretch across local communities including to: (1) listeners—by providing targeted community announcements; (2) local businesses—by providing new and outlets for promoting their products to specific geographic segments of the listening audience; (3) government and politicians—by providing a more efficient means to reach out to specific constituencies within a DMA; and (4) radio stations—by providing new advertising revenue streams to help pay for the production of more local content and provide a means for stations to provide public service announcements to more targeted audiences. Harris Broadcast commends GBS' innovation. The public interest benefits that could be provided by the GBS system should motivate the Commission to issue a Notice of Proposed Rulemaking to fully evaluate GBS' request.

For the foregoing reasons Harris supports GBS' Petition for Rulemaking and believes the Commission should initiate a rulemaking to consider amending 47 C.F.R. § 74.1231(i) to permit FM booster stations to originate programming. Harris Broadcast does not take a position as to what amount of programming the Commission should allow to be originated from FM boosters. Such a question would be appropriately considered as part of a *Notice of Proposed Rulemaking*. Harris Broadcast stands ready to work with the Commission and members of the broadcast industry, such as GBS, to examine innovative ideas that leverage broadcasters' existing infrastructure and enhance the public interest benefits provided by every broadcaster within their local community.

Respectfully submitted,

HARRIS CORPORATION

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/s/

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May 23, 2012

Certificate of Service

I hereby certify that on this the 23rd day of May 2012, I caused a copy of the Comments of Harris Corporation, in response to the Federal Communications Commission's Public Notice on GBS' Petition for Rulemaking, to be served in accordance with 47 C.F.R. § 1.405 and 47 C.F.R. § 1.47, and filed as follows:

- 1) One original copy served by USPS mail to:
Aaron P. Shainis, Esq.
Shainis & Peltzman, Chartered
1850 M Street NW, Suite 240
Washington, DC 20036
- 2) One original copy served via electronic mail to:
aaron@s-plaw.com
- 3) One electronic copy filed via the Federal Communications Commission's Electronic Comment Filing System in RM No. 11659.

Respectfully submitted,
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_____/s/_____

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May 23, 2012